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GERALD ARMSTRONG and THE
5 GERALD ARMSTRONG CORPORATION
6
7

FILED

JAN 13 1994

HOWARD HANSON
MARIN COUNTY CLERK
by P. Fan, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF MARIN

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,)	No. 157 680
a California not-for-profit)	
11 religious corporation,)	ARMSTRONG'S OPPOSITION TO
12)	PLAINTIFF'S MOTION TO
Plaintiff,)	COMPEL PRODUCTION
13 vs.)	
14 GERALD ARMSTRONG; MICHAEL WALTON;)	
THE GERALD ARMSTRONG CORPORATION,)	
15 a California for-profit)	
corporation; DOES 1 through 100,)	
16 inclusive,)	
17 Defendants.)	Date: January 21, 1994
18)	Time: 9:00 a.m.
	Dept: 1
	Trial Date: 9/29/94

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19 This response pertains to the motion to compel regarding the
20 first request for production directed to Gerald Armstrong. It
21 incorporates by reference the arguments set forth in the
22 oppositions filed this date by Armstrong and The Gerald Armstrong
23 Corporation ("TGAC").

24 In addition, each of the items enumerated is irrelevant to
25 this litigation. The first and second causes of action pertain to
26 the allegedly fraudulent transfers of the Fawn Drive house,
27 \$41,500.00 and \$1,000,000.00 in stock in TGAC. Armstrong will
28 amend his responses to the request for production to provide

COPY

1 information that is relevant to this lawsuit, but objects to any
2 general disclosure of his financial affairs, literary works, works
3 of art, etc. between him and TGAC and him and Michael Walton.
4 (Requests 1 and 2) These matters are personal and private and have
5 nothing to do with the instant lawsuit that alleges the transfer
6 of very specific items of property.

7 Armstrong further objects to producing any documents having
8 to do with Entertainment Television (Requests 3, 5-9) as
9 irrelevant to this lawsuit. One November 12, 1993, Judge Thomas
10 issued a minute order whereby he stated "There are no common
11 questions of fact or law between this action and the Los Angeles
12 County Actions." Therefore, discovery having to do with the Los
13 Angeles County Actions is irrelevant to this proceeding and the
14 motion to compel should be denied.

15 Likewise, the generalized requested for Armstrong's writing
16 (Requests 4 and 10) should be denied.

17 Based on the arguments set forth herein and in the
18 accompanying oppositions, generalized financial discovery is
19 improper.

20
21 DATED: January 13, 1994

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22
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24 By: 

FORD GREENE
Attorney for Defendants and
GERALD ARMSTRONG
and THE GERALD ARMSTRONG
CORPORATION

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: ARMSTRONG'S OPPOSITION TO MOTION TO COMPEL DISCOVERY

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

MICHAEL WALTON, ESQ.
707 Fawn Drive
San Anselmo, CA 94960

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[] (Personal) I caused said papers to be personally service on the office of opposing counsel.

[X] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: January 13, 1994

